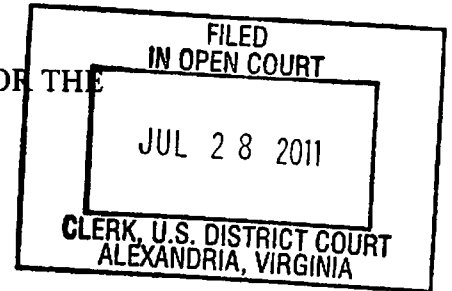


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA)

v.)

FARID AHMAD,
a/k/a "FRED," and)

NAEEM AHMAD,)

Defendants.)

CRIMINAL NO. 1:11cr359

Count 1: 18 U.S.C. § 371
Conspiracy

Count 2: 18 U.S.C. §§ 659 & 21 & 2
Purchase, Receipt, and Possession of
Electronics Stolen from Interstate Carrier

Count 3: 18 U.S.C. §§ 2315 & 21 & 2
Receipt of Stolen Goods

INDICTMENT

July 2011 Term - at Alexandria, Virginia

COUNT I

THE GRAND JURY CHARGES THAT:

From in and around March 2010 through in and around May 2011 within the Eastern District of Virginia and elsewhere, the defendants, FARID AHMAD, also known as "FRED," and NAEEM AHMAD did knowingly combine, conspire, confederate and agree together and with other persons known and unknown to the grand jury to commit the following offenses: purchase, receive, and possess goods, namely electronics, knowing they were stolen from an interstate carrier, in violation of Title 18, United States Code, Sections 659 and 21; and knowingly receive, possess, sell, and dispose of goods of the value of \$5,000 or more, namely electronics, which have crossed a State boundary after being stolen, unlawfully converted, and

taken, knowing the same to have been stolen, unlawfully converted, and taken, in violation of Title 18, United States Code, Sections 2315 and 21.

WAYS, MANNER, AND MEANS TO ACCOMPLISH THE CONSPIRACY

The primary purpose of the conspiracy was to purchase stolen electronics, primarily Apple Inc. products including iPhones and Macbook laptops, for less than their full retail value in order to re-sell the items for profit. The ways, manner and means by which this purpose was carried out included the following:

1. It was part of the conspiracy that members of the conspiracy, while employed at cellular phone kiosks located in shopping malls within the Eastern District of Virginia, purchased electronics, primarily Apple Inc. products including iPhones and Macbook laptops, that they believed to be stolen.
2. It was further part of the conspiracy that members of the conspiracy paid cash for the purchase of the stolen electronics and would then re-sell them.

OVERT ACTS

In furtherance of the said conspiracy and to effect the objects thereof, the defendants and their conspirators committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

1. On or about April 28, 2010, NAEEM AHMAD purchased a stolen iPhone from an undercover officer for \$250 cash at the PCC Wireless cellular phone kiosk at Fashion Centre at Pentagon City, located at 1100 South Hayes Street, Arlington, Virginia.
2. On or about July 20, 2010, NAEEM AHMAD spoke with an undercover officer by telephone and arranged a meeting to take place at or near Potomac Mills Mall, located in

Prince William County, Virginia, during which either NAEEM or his brother FARID AHMAD would purchase additional stolen phones.

3. On or about July 23, 2010, FARID met with the undercover officer and purchased a stolen iPhone, laptop, and carton of cigarettes for \$420 cash. FARID then placed the stolen items in his vehicle.

4. On or about May 23, 2011, NAEEM and FARID spoke with an undercover officer to arrange a meeting on May 25, 2011 at or near Potomac Mills Mall during which the two brothers would purchase stolen electronic items, including twenty-seven iPhones, that the undercover officer told NAEEM and FARID would be stolen from a FedEx truck traveling interstate.

5. On or about May 25, 2011, an undercover officer met NAEEM and FARID in the parking lot of Potomac Mills Mall to purchase the stolen electronic items. NAEEM and FARID handed approximately \$6,400.00 to the undercover officer in exchange for twenty-seven iPhones and several Macbook computers. NAEEM then placed the phones in the trunk of his car.

(In violation of Title 18, United States Code, Section 371.)

COUNT 2

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Prince William County, Virginia, within the Eastern District of Virginia, the defendants, FARID AHMAD, also known as "FRED," and NAEEM AHMAD knowingly purchased, received, and possessed goods, namely electronics, knowing they were stolen from an interstate carrier.

(In violation of Title 18, United States Code, Sections 659, 21, and 2.)

COUNT 3

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2011, in Prince William County, Virginia, within the Eastern District of Virginia, the defendants, FARID AHMAD, also known as "FRED," and NAEEM AHMAD knowingly received and possessed goods of the value of \$5,000 or more, namely electronics, which had crossed a State boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken.


(In violation of Title 18, United States Code, Sections 2315, 21, and 2.)

A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

Foreperson

Neil H. MacBride
United States Attorney

By: 
Justin E. Fairfax
Assistant United States Attorney